

FILED/ACCEPTED

APR -5 2012

Federal Communications Commission
Office of the Secretary

Amendment of Section 73.202(b),) RM-_____
Table of Allotments,)
FM Broadcast Stations)
(Asbury, Iowa))

PETITION FOR RULE MAKING

Citicasters Licenses, Inc. (“Citicasters”), licensee of KWMG(FM), Anamosa, Iowa, FCC Facility ID No. 162475, by its counsel, and pursuant to Sections 1.401 and 1.420 of the Commission’s Rules, 1 hereby petitions the Commission to institute a rule making proceeding to change the channel of the vacant, reserved allotment at Asbury, Iowa, from reserved Channel *238A to reserved Channel *254A, along with a slight change in reference coordinates. Such change of channel/reference coordinates is being sought in conjunction with the proposal being filed concurrently for a construction permit to modify KWMG(FM) for a class upgrade from Class A to Class C3 (the “KWMG Upgrade Application”). 2 Consequently, the

¹ 47 C.F.R. §§ 1.401 and 1.420. See also *See Revision of Procedures Governing Amendments to FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services*, Report and Order, 21 FCC Rcd 14212 (2006) (“*Revision of Allocation Procedures*”).

2 The KWMG Upgrade Application is being filed concurrently with this Petition by the submission of an amendment to a pending application on FCC Form 301 for a construction permit for the minor modification of KWMG(FM). See FCC File No. BPH-20111209DSS. For the purposes of establishing same-day filing, the Commission recognizes that an amendment to an earlier-filed application filed on the same day with a contingent application is considered as a same-day filing for the purposes of 47 C.F.R. Section 73.3517(e). See *The Last Bastion Station Trust, LLC*, 23 FCC Red 4941 (Chief, Audio Div., Media Bur. 2008). Such a policy necessarily is equally applicable to a same-day filed contingent application amendment and a petition for rule making in a hybrid proceeding.

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subject Petition and the KWMG Upgrade Applications constitute a “hybrid” proposal to improve service to the public.

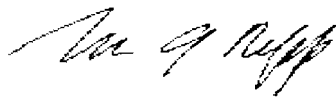
The attached Engineering Exhibit establishes that, from the proposed allotment reference coordinates, a facility operating on reserved Channel *254A will provide the requisite 70 dBu coverage to Asbury, Iowa, and will comply with the Commission’s minimum spacing requirements.

Issuance of a Notice of Proposed Rule Making and subsequent adoption of the proposed change of channel of the vacant, reserved allotment at Asbury, Iowa, from Channel *238A to Channel *254A, along with the specified change in reference coordinates, will serve the public interest by permitting Citicasters to upgrade service by KWMG, while still providing the option for future service to Asbury, Iowa. Thus, it is hereby respectfully requested that the Commission initiate a rule making proceeding to amend Section 73.202(b), the FM Table of Allotments, as follows:

	<u>Present</u>	<u>Proposed</u>
Asbury, Iowa	*238A	*254A

Respectfully submitted,

CAPSTAR LICENSES, INC.

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Its Attorney

April 5, 2012

Engineering Exhibit

Reallocate Vacant Channel*238A at Asbury, IA to Channel*254A

To allow the proposed upgrade of Station KWMG from Class A to Class C3, it is necessary to reallocate the vacant reserved Channel *238A allotment at Asbury, Iowa, to reserved Channel *254A. This channel substitution matches the proposal channel change of the Asbury allotment that was part of a recently terminated rulemaking proceeding.¹

Allocation Location

The proposed new allocation reference coordinates for reserved Channel *254A at Asbury, Iowa are:

42° 29' 23" North Latitude
90° 46' 56" West Longitude

This is a slight site change of the current reference allocation coordinates for Asbury. This is the same location proposed in MB Docket No. 08-150.

Spacing Compliance

With the exception of the terminated proposal in MB Docket No. 08-150, the spacing study attached as Figure 1 demonstrates that the proposed allocation location is fully spaced for the proposed channel and class.

Principal Community Signal

Coverage over the community of Asbury, Iowa is predicted from the allocation location as demonstrated in Figure 2.

Troy G. Langham
FCC Engineering Supervisor
April 5, 2012

¹ See *Report and Order*, DA 12-512, MB Docket No. 08-150, RM-11390 (Ass't Chief, Audio. Div., Med. Bur. Rel. April 2, 2012). The prior proposed channel change for the Asbury, Iowa allotment was terminated because the corresponding hybrid application had been dismissed. See *id.* at ¶ 3.

Figure 1 -Asbury, Iowa Allotment Spacing Study

Asbury Alloc Channel Change to 254
Clear Channel

REFERENCE
42 29 29.0 N.
90 46 56.0 W.

CLASS = A
Current Spacings to 3rd Adj.
Channel 254 - 98.7 MHz -----
DISPLAY DATES
DATA 04-03-12
SEARCH 04-04-12

Call	Channel	Location	Azi	Dist	FCC	Margin
R11701	ADD 254A	Asbury	IA	0.0	0.00	114.5 -114.5
Proposed substitute channel and new site						
WVCX	LIC 255C0	Tomah	WI	9.7	153.67	151.5 2.2
KDST	LIC 257A	Dyersville	IA	259.3	36.15	30.5 5.7
KHAK	LIC 251C1	Cedar Rapids	IA	227.8	93.14	74.5 16.6
WLKU	LIC 255B	Rock Island	IL	165.4	133.34	112.5 20.8
WXXQ	LIC 253B1	Freeport	IL	100.6	121.59	95.5 26.1
KMGO	CP 254C0	Centerville	IA	229.6	245.42	214.5 30.9
One Step Application						
WDMP-FM	LIC 257A	Dodgeville	WI	47.7	71.34	30.5 40.8
KOEL-FM	LIC 253C3	Cedar Falls	IA	268.3	132.88	68.5 44.4
WJTY	LIC 201C2	Lancaster	WI	29.1	58.93	14.5 44.4
From Channel 201C3						
KMGO	LIC 254C1	Centerville	IA	223.4	257.02	199.5 57.5
WMGN	LIC 251B	Madison	WI	64.9	126.31	68.5 57.8
KSMA-FM	LIC 254C3	Osage	IA	298.6	208.96	141.5 67.5

Figure 2 – Map of Allotment Community Coverage

